

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
IN ADMIRALTY

MARKEL AMERICAN INSURANCE COMPANY, *
Plaintiff *
vs. *
*
RAYMOND FERRONE, * CIVIL ACTION
Defendant and Third Party Plaintiff * NO. 04-CV-12144-GAO
vs. *
*
SHENKEL INSURANCE AGENCY, INC., *
Third Party Defendant *

ASSENTED-TO
**MOTION OF THE THIRD PARTY DEFENDANT, SHENKEL INSURANCE
AGENCY, INC. FOR AN EXTENSION OF TIME
TO RESPOND TO THE THIRD PARTY COMPLAINT**

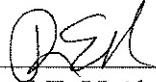
Now comes the Third Party Defendant, Shenkel Insurance Agency, Inc. ("Shenkel Insurance"), and moves this Court for an extension of time to respond to the Third Party Plaintiff, Raymond Ferrone's, Third Party Complaint. Shenkel Insurance requests this Court's permission to file its responsive pleading by September 16, 2005. As grounds therefor, Shenkel Insurance states that it needs more time to conduct an investigation into the allegations made by the Third Party Plaintiff before answering the Third Party Complaint. All parties to this action have assented to such an extension.

WHEREFORE, Third Party Defendant, Shenkel Insurance Agency, Inc. respectfully moves this Court for permission to file its response to the Third Party Complaint on or before September 16, 2005.

Respectfully submitted,

SHENKEL INSURANCE AGENCY, INC.,
Third Party Defendant

By Its Attorney:



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MARKEL AMERICAN INSURANCE
COMPANY, Plaintiff

By Its Attorney:



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RAYMOND FERRONE, Defendant and
Third-Party Plaintiff

By Its Attorney:



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Dated: August 24, 2005